REMARKS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application are anticipated under the provisions of 35 U.S.C. § 102. Thus, the Applicants believe that all of these claims are now in allowable form.

I. REJECTION OF CLAIMS 26-30 UNDER 35 U.S.C. § 102

The Examiner rejected claims 26-30 as being anticipated by US Patent 6,219,699, issued on April 17, 2001, hereinafter referred to as "McCloghrie." The Applicants respectfully traverse the rejection.

McCloghrie teaches a multiple VLAN architecture system. McCloghrie teaches a LAN switch that is configured to 1) receive frames from a first VLAN associated with a first VLAN transmit protocol and encapsulated using a multiple-VLAN transmit protocol, 2) to remove the encapsulation, 3) to re-encapsulate the frames with a second VLAN transmit protocol and 4) to transmit the re-encapsulated frames onto a second VLAN. (See McCloghrie, column 3, lines 18-24.)

The Examiner's attention is directed to the fact that McCloghrie fails to teach or to suggest the novel concept of a method for operating a switch comprising <u>mapping a tag in the Ethernet frame received at the one ingress port to a second tag associated with the egress port through which the switch outputs the frame</u>, as positively claimed by Applicants' independent claims 26 and 30. Specifically, Applicants' independent claims 26 and 30 recite:

> 26.   In an Ethernet protocol network having at least one switch with plurality of ingress ports that are each adapted to receive at least one Ethernet frame that includes <u>a tag that identifies a particular network sending the frame</u>, and the switch having at least one egress port on which the frame is output, a method for operating said switch, comprising the step of:
>   <u>mapping the tag that identifies said particular network in the Ethernet frame received at the one ingress port to a second tag associated with the egress port through which the switch outputs the frame</u>; and

overwriting the tag in the Ethernet frame with the second tag prior to outputting the frame on the egress port. (Emphasis added.)

30.   In an Ethernet protocol network having at least one switch with plurality of ingress ports that are each adapted to receive at least one Ethernet frame that includes <u>a Virtual Local Area Network (VLAN) ID tag that identifies a particular network sending the frame to that ingress port</u>, and the switch has at least one egress port on which the frame is output, a method for operating said switch, comprising the steps of:

<u>mapping the tag that identifies said particular network in the Ethernet frame received at the one ingress port to a second tag using a unique tuple of the port and a Virtual Local Area Network (VLAN) identifier</u>; and

overwriting the tag in the Ethernet frame received at the one ingress port with the second tag prior to outputting the frame on the egress port. (Emphasis added.)

In one embodiment, Applicants' invention is a method for operating a switch comprising <u>mapping a tag in the Ethernet frame received at the one ingress port to a second tag associated with the egress port through which the switch outputs the frame</u>. Thus, in one embodiment, the second tag, i.e. the customer descriptor, advantageously enables the receiving platform to distinguish between different customers served by that platform. (See Applicants' specification, Page 2, line 30 – Page 3, line 2.)

McCloghrie fails to anticipate Applicants' invention because the "tags" taught by McCloghrie are not the same as the second tag taught by the Applicants' invention. The Examiner's attention is directed to the fact that the "tags" taught by McCloghrie <u>only identify the transmit protocol of the VLAN</u>. (See McCloghrie, col. 3, lines 10-24; Column 3, lines 59-67) For example, McCloghrie states that:

"...the tag 107 uses a tagging technique particular to that VLAN technology. For example, the tag 107 for the same VLAN 106 may be the character string 'GR' for LANE, the numeric value '1024' for IEEE 802.10, or the numeric value '10' for ISL.' (See McCloghrie, Column 3, lines 13-17)

"When a frame 104 must be forwarded from a first VLAN segment 108 to a second VLAN segment 108, the LAN-switch 103 removes tags

107 (shown in the figure as the numeric value `10`) for a first VLAN segment 108 and replaces them with tags 107 (shown in the figure as the character string value `GR`) for a second VLAN segment 108." (See McCloghrie, Column 3, lines 61-67)

Thus, clearly, the "tags" taught by McCloghrie **only identify and change the transmit protocol of the VLAN**.

In contrast, the original tag as used by the Applicants is used to identify a particular network and **not** a transmit protocol of the VLAN as disclosed by McCloghrie. Furthermore, Applicants' second tag is a customer descriptor. (See Applicants' specification, Page 2, line 10 – Page 3, line 2.) In one embodiment, the customer descriptor advantageously enables the receiving platform to distinguish between different customers served by that platform. (See *Id.*) The "tags" taught by McCloghrie would only allows frames from one type of VLAN transmit protocol to be forwarded to another type of VLAN with a different transmit protocol.

In addition, the method taught by McCloghrie to replace the first "tag" with a second "tag" is more complicated and involves more steps. McCloghrie teaches 1) receiving an encapsulated frame, 2) removing the encapsulation, 3) re-encapsulating the frames and 4) transmitting the re-encapsulated frames. (See McCloghrie, col. 3, ll. 18-24.) In contrast, Applicants' method only teaches **overwriting** the first tag with the second tag, rather than encapsulating as taught by McCloghrie. (See Applicants' specification, Page 2, line 10 – Page 3, line 2.)

Therefore, McCloghrie clearly fails to anticipate Applicants' independent claims 26 and 30.

Moreover, dependent 27-29 depend, either directly or indirectly, from independent claim 26 and recite additional limitations. As such, and for the exact same reason set forth above, the Applicants submit that claims 27-29 are also patentable and not anticipated by McCloghrie. As such, the Applicants respectfully request the rejection be withdrawn.

CONCLUSION

Thus, the Applicants submit that all of these claims now fully satisfy the requirements of 35 U.S.C. § 102. Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the issuance of a final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully Submitted,

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